

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

EUCLIDES SOTO, LOUIS A. MARTINEZ,	)	
JOSE RAMIREZ, CLEMENTE HERNANDEZ,	)	
CESAR PIZARO, ELISON PENA,	)	
JUAN COLON, JOSE ORTIZ,	)	
RAFAEL TORRES, ANGEL BAEZ,	)	
ANTONIO MARTINEZ, WILFREDO ORTIZ,	)	
EULOGIO ORTIZ, MIRRAIN MIRANDA,	)	CIVIL ACTION
RAFAEL MORENO, NELSON ACEVEDO,	)	NO. 04-10892-JLT
And RAMON RODRIGUEZ,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
SHERMAN-FEINBERG CORPORATION,	)	
FARNSWORTH FIBRE CORPORATION,	)	
UNITED STEELWORKERS OF AMERICA,	)	
LOCAL 421-U, AND UNITED STEEL WORKERS	)	
OF AMERICA,	)	
	)	
Defendants.	)	

**ANSWER OF SHERMAN-FEINBERG CORPORATION AND  
FARNSWORTH FIBRE CORPORATION**

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted, except that defendant is out of business and no longer has a principal place of business at 185 Old Colony Avenue.
5. Admitted, except that defendant is out of business and no longer has a principal place of business at 185 Old Colony Avenue
6. No answer required of these defendants.

7. No answer required of these defendants.

8. Defendants have insufficient information upon which to base an answer to the allegations of this paragraph, and call upon plaintiffs to prove same.

9. Admitted.

10. No answer required of these defendants.

11. No answer required of these defendants.

12. No answer required of these defendants.

13. No answer required of these defendants.

14. No answer required of these defendants.

15. No answer required of these defendants.

16. No answer required of these defendants.

17. No answer required of these defendants.

18. No answer required of these defendants.

19. Denied.

20. Defendants repeat their answers to paragraphs 1-18.

21. Defendants have insufficient information upon which to base an answer to the allegations of this paragraph, and call upon plaintiffs to prove same.

22. No answer required of these defendants.

23. No answer required of these defendants.

24. No answer required of these defendants.

25. No answer required of these defendants.

26. No answer required of these defendants.

27. No answer required of these defendants.

- 28. Defendants deny that the workplace was unsafe.
- 29. No answer required of these defendants.
- 30. No answer required of these defendants.
- 31. Defendants deny that the workplace was a “sweat shop” or that any bodies were “incinerated”.

AND FURTHER ANSWERING, the defendants say that the Complaint fails to state a course of action against either or both of them for which relief may be granted.

AND FURTHER ANSWERING, the defendants say that this Court does not have jurisdiction over them because of a failure by the plaintiffs to properly serve the amended complaint.

SHERMAN-FEINBERG CORPORATION AND  
FARNSWORTH FIBRE CORPORATION  
By their attorneys,

/s/ Franklin H. Levy  
Duane Morris LLP  
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DATED: May 13, 2005